

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DWAIN EDWARD THOMAS,

Plaintiff,

v.

KEVIN STITT, *et al*,

Defendants.

Case No.: 20-cv-944-D

**DEFENDANTS' OBJECTIONS TO
PLAINTIFFS' FINAL EXHIBIT LIST**

Defendants Tom Bates, T. Hastings Siegfried, and Steven Harpe submit the following objections to Plaintiffs' Final Exhibit List [Doc. 98] in accordance with the Court's Scheduling Order. [Docs. 70, 79].¹

EXHIBITS

NO.	DOCUMENT	OBJECTION
1.	Retention Schedule of governor's Office (BS 00001-000014)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
2.	PPB Records Disposition Schedule (BS 00015-00019)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
3.	Plaintiff Dwain Thomas Parole Docket Ballot – October 2022 (BS 00020)	

¹ The original Court's Scheduling Order [Doc. 70] stated that the listing of witnesses and exhibits shall separately state those expected to be called or used and those which may be called or used if the need arises. Plaintiff did not comply with such requirements in their Final Exhibit List [Doc. 98].

4.	Plaintiff Dwain Thomas Investigative Report – 09/01/2022 (BS 00021-00023)	
5.	Plaintiff Dwain Thomas Request to Parole Investigator – 08/25/2020 (BS 00024)	
6.	Plaintiff Dwain Thomas Request to Parole Investigator – 03/04/2020 (BS 00025)	
7.	Plaintiff Dwain Thomas Request to Parole Investigator – 10/10/2019 (BS 00026)	
8.	Plaintiff Dwain Thomas Request to Parole Investigator – 09/08/2019 (BS 00027-00029)	
9.	Plaintiff Dwain Thomas Parole Docket Ballot – October 2019 (BS 00030)	
10.	Plaintiff Dwain Thomas Request to Parole Investigator – 10/10/2019 (BS 00031)	
11.	Plaintiff Dwain Thomas Docket Ballot – October 2016 (BS 00032)	
12.	Plaintiff Dwain Thomas Investigative Report – 9/6/2016 (BS 00033-00035)	
13.	Plaintiff Dwain Thomas Investigative Report – 9/5/2013 (BS 00036-00038)	
14.	Plaintiff Dwain Thomas Parole Docket Ballot – October 2013 (BS 00039)	
15.	Plaintiff Dwain Thomas Investigative Report – 10/22/2010 (BS 00040-00042)	
16.	Plaintiff Dwain Thomas Parole Docket Ballot – October 2010 (BS 00043)	
17.	Notification of Parole Consideration Date (BS 00044)	

18.	Pardon and Parole Board Docketing Worksheet (BS 00045)	
19.	Pardon and Parole Board Appeal of Parole Docket Date Form (BS 00053)	
20.	Department of Corrections Notification of Parole Hearing Form (BS 00054)	
21.	Pardon and Parole Board Waiver of Parole Form (BS 00055)	
22.	Pardon and Parole Board Inmate Request to Parole Investigator Form (BS 00056)	
23.	Pardon and Parole Board Parole Consideration Form (BS 00057)	
24.	Pardon and Parole Board Parole Interview Questionnaire (BS 00058-64)	
25.	Pardon and Parole Board Form 007-A – Request for Jacket Review (BS 00065)	
26.	Pardon and Parole Board Employee Handbook – 2022 (BS 00066-00137)	
27.	Pardon and Parole Board Investigators Handbook – 2023 (BS 00138-188)	
28.	Pardon and Parole Board Member Orientation Binder (BS 00189-307)	
29.	Parole Process Procedures Training PowerPoint (BS 01137-01195)	
30.	March 2019 Parole Docket (BS 01197-01298)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
31.	April 2019 Parole Docket (BS 01299-01398)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
32.	December 2019 Parole docket (BS 01399-01525)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
33.	May 2019 Parole Docket (BS 01526-01625)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
34.	June 2019 Parole Docket (BS 01626-01769)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
35.	July 2019 Parole Docket (BS 01770-01924)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
36.	September 2019 Parole Docket (BS 01925-02086)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
37.	October 2019 Parole Docket (BS 02087-02199)	
38.	November 2019 Parole Docket (BS 02200-02303)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
39.	January 2020 Parole Docket (BS 03241-03404)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
40.	February 2020 Parole Docket (BS 03405-03513)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
41.	March 2020 Parole Docket (BS 03514-03631)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
42.	April 2020 Parole Docket (BS 03157-03240)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
43.	May 2020 Parole Docket (BS 03632-03732)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
44.	June 2020 Parole Docket (BS 02672-02800)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
45.	July 2020 Parole Docket (BS 02540-02671)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
46.	August 2020 Parole Docket (BS 02304-02431)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
47.	September 2020 Parole Docket (BS 03011-03156)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
48.	October 2020 Parole Docket (BS 02921-03010)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

49.	November 2020 Parole Docket (BS 02801-02920)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
50.	December 2020 Parole Docket (BS 02432-02539)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
51.	January 2021 Parole Docket (BS 04179-04311)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
52.	February 2021 Parole Docket (BS 04053-04178)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
53.	March 2021 Parole Docket (BS 04578-04830)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
54.	April 2021 Parole Docket (BS 03733-03839)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
55.	May 2021 Parole Docket (BS 04831-04929)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
56.	June 2021 Parole Docket (BS 04436-04577)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
57.	July 2021 Parole Docket (BS 04312-04435)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
58.	August 2021 Parole Docket (BS 03840-03932)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
59.	September 2021 Parole Docket (BS 05169-05301)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
60.	October 2021 Parole Docket (BS 05040-05168)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
61.	November 2021 Parole Docket (BS 04930-05039)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
62.	December 2021 Parole Docket (BS 3933-04052)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
63.	January 2022 Parole Docket (BS 05763-05866)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
64.	February 2022 Parole Docket (BS 05640-05762)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
65.	March 2022 Parole Docket (BS 06088-06186)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

66.	April 2022 Parole Docket (BS 05302-05389)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
67.	May 2022 Parole Docket (BS 06187-06296)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
68.	June 2022 Parole Docket (BS 05985-0687)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
69.	July 2022 Parole Docket (BS 05867-05984)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
70.	August 2022 Parole Docket (BS 05390-05505)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
71.	September 2022 Parole Docket (BS 06539-06655)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
72.	October 2022 Parole Docket (BS 06419-06538)	
73.	November 2022 Parole Docket (BS 06297-06418)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403..
74.	December 2022 Parole Docket (BS 05506-05639)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

75.	January 2023 Parole Docket (BS 07175-07135)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
76.	February 2023 Parole Docket (BS 07049-07174)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
77.	March 2023 Parole Docket (BS 07592-07720)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
78.	April 2023 Parole Docket (BS 06656-06775)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
79.	May 2023 Parole Docket (BS 07721-07866)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
80.	June 2023 Parole Docket (BS 07456-07591)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
81.	July 2023 Parole Docket (BS 07316-07455)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
82.	August 2023 Parole Docket (BS 06776-06918)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
83.	September 2023 Parole Docket (BS 08109-08251)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
84.	October 2023 Parole Docket (BS 07895-08108)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
85.	November 2023 Parole Docket (BS 07876-07984)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
86.	December 2023 Parole Docket (BS 06919-07048)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
87.	January 2024 Parole Docket (BS 08252-08395)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
88.	June 2018 Parole Ballots (BS 08412-08687)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
89.	July 2018 Parole Ballots (BS 08688-08888)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
90.	August 2018 Parole Ballots (BS 08889-09176)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
91.	September 2018 Parole Ballots (BS 09177-09428)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

92.	October 2018 Parole Ballots (BS 09429-09700)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
93.	November 2018 Parole Ballots (BS 09701-09987)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
94.	December 2018 Parole Ballots (BS 0988-10276)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
95.	January 2019 Parole Ballots (BS 20885-21088)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
96.	February 2019 Parole Ballots (BS 21089-21281)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
97.	March 2019 Parole Ballots (BS 21282-21481)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
98.	April 2019 Parole Ballots (BS 21482-21671)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
99.	May 2019 Parole Ballots (BS 21672-21870)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
100.	June 2019 Parole Ballots (BS 21871-22140)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
101.	July 2019 Parole Ballots (BS 22141-22325)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
102.	August 2019 Parole Ballots (BS 22326-22606)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
103.	September 2019 Parole Ballots (BS 22607-22923)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
104.	October 2019 Parole Ballots (BS 22924-23141)	
105.	November 2019 Parole Ballots (BS 10277-10483)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
106.	December 2019 Parole Ballots (BS 23142-23384)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
107.	January 2020 Parole Ballots (BS 10484-10809)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
108.	February 2020 Parole Ballots (BS 10810-11026)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
109.	March 2020 Parole Ballots (BS 11027-11258)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
110.	April 2020 Parole Ballots (BS 11259-11425)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
111.	May 2020 Parole Ballots (BS 11426-11625)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
112.	September 2020 Parole Ballots (BS 11626-11915)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
113.	October 2020 Parole Ballots (BS 11916-12091)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
114.	November 2020 Parole Ballots (BS 12092-12327)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
115.	December 2020 Parole Docket (BS 12328-12541)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
116.	January 2021 Parole Ballots Pt 1(BS 12542-12604)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
117.	January 2021 Parole Ballots Pt 2(BS 12605-12662)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

118.	January 2021 Parole Ballots Pt 3(BS 12663-12759)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
119.	February 2021 Parole Ballots (BS 12760-13004)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
120.	March 2021 Parole Ballots Pt 1(BS 13005-13289)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
121.	March 2021 Parole Ballots Pt 2(BS 13290-13501)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
122.	April 2021 Parole Ballots (BS 13502-13714)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
123.	May 2021 Parole Ballots (BS 13715-13909)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
124.	June 2021 Parole Ballots (BS 13910-14188)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
125.	July 2021 Parole Ballots (BS 14189-14434)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
126.	August 2021 Parole Ballots (BS 14435-14617)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403
127.	September 2021 Parole Ballots (BS 14618-14885)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
128.	October 2021 Parole Ballots (BS 14886-15138)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
129.	November 2021 Parole Ballots (BS 15139-15351)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
130.	December 2021 Parole Ballots (BS 15352-15585)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
131.	January 2022 Parole Ballots (BS 15586-15792)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
132.	February 2022 Parole Ballots (BS 15793-16033)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
133.	March 2022 Parole Ballots (BS 16034-16229)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403
134.	April 2022 Parole Ballots (BS 16230-16404)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

135.	May 2022 Parole Ballots (BS 16405-16622)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
136.	June 2022 Parole Ballots (BS 16623-16824)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
137.	July 2022 Parole Ballots (BS 16825-17057)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
138.	August 2022 Parole Ballots (BS17058-17285)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
139.	September 2022 Parole Ballots (BS 17286-17518)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
140.	October 2022 Parole Ballots (BS 17519-17756)	
141.	November 2022 Parole Ballots (BS 17757-17997)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
142.	December 2022 Parole Ballots (BS 17998-18258)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
143.	January 2023 Parole Ballots (BS 18259-18536)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.

144.	February 2023 Parole Ballots (BS 18537-18786)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
145.	March 2023 Parole Ballots (BS 18787-19043)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
146.	April 2023 Parole Ballots (BS 19044-19283)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
147.	May 2023 Parole Ballots (BS 19284-19573)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
148.	June 2023 Parole Ballots (BS 19574-19842)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
149.	July 2023 Parole Ballots (BS 19843-20118)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
150.	August 2023 Parole Ballots (BS 20119-20401)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
151.	October 2023 Parole Ballots (BS 20402-20647)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
152.	November 2023 Parole Ballots (BS 20648-20883)	Irrelevant, confusion of issues, waste of

		time. Fed. R. Evid. 401-403.
153.	December 2023 Parole Ballots (BS 20884-21142)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
154.	Plaintiff Thomas Notification of Parole Hearing Date (BS 23385)	
155.	October 2019 Parole and Business Meeting Minutes (BS 23386-23392)	
156.	Resignation Correspondence from Adam Luck and Kelly Doyle to Governor Stitt (STITT 00001-00006)	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
157.	Pardon and Parole Board Policy 102 – Duties and Responsibilities of the Pardon and Parole Board	
158.	Pardon and Parole Board Policy 102 – Duties, Responsibilities, and Code of Conduct	
159.	Department of Corrections Policies and Procedures Section 01 – Organization	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
160.	Department of Corrections Policies and Procedures Section 02 – Information Management	Irrelevant, confusion of issues, waste of time. Fed. R. Evid. 401-403.
161.	Department of Corrections Policies and Procedures Section 06 – Classification and Case Management	
162.	Department of Corrections Policies and Procedures Section 09 – Programs	

163.	Plaintiff Thomas's Complaint [Doc. 1]	Improper. FRE 801 - 803
164.	Defendant Stitt's Responses to Plaintiff's First Set of Interrogatories – 2/21/2024	Not best evidence. FRE 801 - 803
165.	Verification Stitt TSP – 3/11/2024	Relevance.
166.	Defendant Stitt's Responses to Plaintiff's Second Set of Interrogatories and Verification – 6/17/2024	Not best evidence. FRE 801 - 803
167.	Defendant's Stitt's Responses to Plaintiff's 6/20/2024 First Set of Requests for Admission and Verification (forthcoming)	Fed. R. Civ. P. do not require a party to supply a verification for responses and objections to RFA. FRE 801 - 803
168.	Any responses by Defendant Stitt to forthcoming discovery served by Plaintiff during the discovery period	Vague, improperly identified all objections reserved; not best evidence. FRE 801 - 803
169.	Defendant Bates' Responses to Plaintiff's First Set of Interrogatories – 2/21/2024	Not best evidence. FRE 801 - 803
170.	Verification PPB – 3/12/2024	Relevance. FRE 801 - 803
171.	Defendant Bates' Supplemental Responses to Plaintiff's First Set of Interrogatories – 5/15/2024	Not best evidence. FRE 801 - 803
172.	Verification of Defendant Bates' Supplemental Responses to Plaintiff's First Set of Interrogatories	Relevance; not best evidence. FRE 801 - 803
173.	Defendant Bates' Responses to Plaintiff's Second Set of Interrogatories and Verification	Not best evidence. FRE 801 - 803
174.	Defendant's Bates' Responses to Plaintiff's 6/20/2024 First Set of Requests for Admissions and Verification (forthcoming)	Fed. R. Civ. P. do not require a party to supply a verification for responses and objections to RFA;

		Not best evidence. FRE 801 - 803
175.	Any responses of Defendant Bates' to forthcoming discovery served by Plaintiff during the discovery period.	Not identified all objections reserved.
176.	Defendant Harpe's Responses to Plaintiff's First set of Interrogatories – 2/21/2024	Not best evidence. FRE 801 - 803
177.	Verification DOC – 3/12/2024	Relevance.
178.	Defendant Harpe's Supplemental Responses to Plaintiff's First Set of Interrogatories – 5/30/2024	Not best evidence. FRE 801 - 803
179.	Verification Defendant Harpe's Supplemental Responses to Plaintiff's First Set of Interrogatories – 5/29/2024	Relevance. FRE 801 - 803
180.	Defendant Harpe's Responses to Plaintiff's Second Set of Interrogatories – 6/26/2024	Not best evidence. FRE 801 - 803
181.	Verification of Defendant Harpe's Responses to Plaintiff's Second Set of Interrogatories (not yet received)	Relevance. FRE 801 - 803
182.	Defendant Harpe's Responses to Plaintiff's 6/20/24 First Set of Requests for Admissions Verification (forthcoming)	Fed. R. Civ. P. do not require a party to supply a verification for responses and objections to RFA. FRE 801 - 803
183.	Any responses by Defendant Harpe to forthcoming discovery served by Plaintiff during the discovery period.	Not identified all objections reserved. FRE 801 - 803
184.	Defendant Siegfried's Responses to Plaintiff's First Set of Interrogatories – 2/21/2024	Not best evidence. FRE 801 - 803
185.	Verification BOC – 3/12/2024	Relevance. FRE 801 - 803

186.	Defendant Siegfried's Supplemental Responses to Plaintiff's First Set of Interrogatories – 6/3/2024	Not best evidence. FRE 801 - 803
187.	OBAC Verification – 6/3/2024	Relevance. FRE 801 - 803
188.	Any responses by Defendant Siegfried to forthcoming discovery served by Plaintiff during the discovery period.	Not identified all objections reserved. FRE 801 - 803
189.	All policies, laws, and regulations relevant to the Oklahoma parole process not specifically enumerated elsewhere on Plaintiff's exhibit list.	Vague, overly broad; not properly identified; all objections reserved
190.	Plaintiff's Deposition Exhibits 1-38 and any exhibits introduced by Plaintiff in depositions that have not yet occurred.	Vague, overly broad, not properly identified or duplicative; all objections reserved.
191.	All deposition transcripts and/or video depositions and all exhibits attached thereto for purposes of impeachment and/or refreshing recollection.	Fed. R. Civ. P. 401, 402, 801, 802. Fed. R. Civ. P. 32
192.	All exhibits identified by any Defendant not objected by Plaintiff.	
193.	Demonstrative exhibits, visual aids, charts, graphs, photographs, diagrams, enlargements and/or summaries prepared by Plaintiff, if any.	
194.	Any and all exhibits for impeachment and/or rebuttal.	
195.	Plaintiff reserves the right to list additional exhibits identified in or necessitated by subsequent discovery or depositions.	

Respectfully submitted,

s/ Alejandra Brigida

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*Attorneys for Defendants Tom Bates, T. Hastings Siegfried, and
Steven Harpe*

CERTIFICATE OF SERVICE

I hereby certify that on 12th day of July 2024, I electronically transmitted the foregoing document to the Clerk of the Court using the CM/ECF System for filing. I further certify that a true and correct copy of the foregoing document was sent via the CM/ECF System to all counsel of record who are ECF participants.

s/ Alejandra Brigida

Alejandra Brigida